



Joseph E. Kernan
Governor

Lori F. Kaplan
Commissioner

March 8, 2004

100 North Senate Avenue
P.O. Box 6015
Indianapolis, Indiana 46206-6015
(317) 232-8603
(800) 451-6027
www.in.gov/idem

TO: Interested Parties / Applicant

RE: Munster Steel Company, Inc. / 089-17252-00090

FROM: Paul Dubenetzky
Chief, Permits Branch
Office of Air Quality

Notice of Decision: Approval – Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-17-3-4 and 326 IAC 2, this permit modification is effective immediately, unless a petition for stay of effectiveness is filed and granted, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3-7 and IC 13-15-7-3 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204, **within eighteen (18) days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

- (1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
- (2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
- (3) The date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

- (1) the name and address of the person making the request;
- (2) the interest of the person making the request;
- (3) identification of any persons represented by the person making the request;
- (4) the reasons, with particularity, for the request;
- (5) the issues, with particularity, proposed for considerations at any hearing; and
- (6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

Pursuant to 326 IAC 2-7-18(d), any person may petition the U.S. EPA to object to the issuance of a Title V operating permit or modification within sixty (60) days of the end of the forty-five (45) day EPA review period. Such an objection must be based only on issues that were raised with reasonable specificity during the public comment period, unless the petitioner demonstrates that it was impracticable to raise such issues, or if the grounds for such objection arose after the comment period.

To petition the U.S. EPA to object to the issuance of a Title V operating permit, contact:

U.S. Environmental Protection Agency
401 M Street
Washington, D.C. 20406

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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March 8, 2004

Jeanne Demeter
Munster Steel Co., Inc.
9505 Calumet Avenue
Munster, Indiana 46321

Re: 089-17252-00090
First Significant Permit Modification to:
Part 70 Permit No.: T089-4292-00090

Dear Ms. Demeter:

Munster Steel Co., Inc., was issued a Part 70 operating permit T089-4292-00090 on March 25, 2002, for a structural and miscellaneous steel fabricating plant. A letter requesting changes to this permit was received on April 21, 2003. Pursuant to 326 IAC 2-7-12, a significant permit modification to this permit is hereby approved as described in the attached Technical Support Document.

The modification consists of replacing the existing shot-blaster with a new blast machine and adding a new drill machine.

All other conditions of the permit shall remain unchanged and in effect. Please find attached a copy of the revised permit.

Pursuant to Contract No. A305-0-00-36, IDEM, OAQ has assigned the processing of this application to Eastern Research Group, Inc., (ERG). Therefore, questions should be directed to Yu-Lien Chu, ERG, 1600 Perimeter Park Drive, Morrisville, North Carolina 27560, or call (919) 468-7871 to speak directly to Ms. Chu. Questions may also be directed to Duane Van Laningham at IDEM, OAQ, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, or call (800) 451-6027, press 0 and ask for Duane Van Laningham, or extension 3-6878, or dial (317) 233-6878.

Sincerely,

Original Signed by Paul Dubenetzky
Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

Attachments

ERG/YC

cc: File - Lake County
Lake County Health Department
Northwest Regional Office
Air Compliance Section Inspector - Rick Massoels
Compliance Data Section

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Administrative and Development -Sara Cloe
Technical Support and Modeling - Michele Boner



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PART 70 OPERATING PERMIT OFFICE OF AIR QUALITY

Munster Steel Co., Inc.
9505 Calumet Ave.
Munster, Indiana 46321

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T089-4292-00090	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: March 25, 2002 Expiration Date: March 25, 2007

First Significant Permit Modification No.: 089-17252-00090	Page Affected: 5, 26, 29, 30, 31 and 35
Issued by: Original Signed by Paul Dubenetzky Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: March 8, 2004



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SECTION A

SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)]

The Permittee owns and operates a stationary structural and miscellaneous steel fabricating plant.

Responsible Official:	President
Source Address:	9505 Calumet Ave., Munster, Indiana 46321
Mailing Address:	9505 Calumet Ave., Munster, Indiana 46321
General Source Phone Number:	(219) 924-5198
SIC Code:	3441
County Location:	Lake
Source Location Status:	Nonattainment for SO ₂ and ozone Attainment for all other criteria pollutants
Source Status:	Part 70 Permit Program Minor Source, under PSD and Emission Offset Rules; Not 1 of 28 Source Categories

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

- (a) One (1) paint booth, coating structural steel, constructed in 1960, with a maximum capacity of 12.0 gallons of coating per hour, utilizing airless spray, with no control;
- (b) One (1) welding/flame-cutting operation, constructed in 1972, consisting of three (3) submerged arc welding stations with a maximum capacity of 18 inches of wire per minute, four (4) metal inert gas welding stations with a maximum hourly capacity of 22 inches of wire per minute; seventeen (17) stick welding stations with a maximum of 40 electrodes per hour, and one (1) propane flame-cutting station with a maximum cutting rate of 12 inches per minute;
- (c) One (1) blasting operation, originally constructed in 1970 using sand as the abrasive, modified in 1987 to use Black Beauty Grit, with a nozzle internal diameter of 0.5 inches and a nozzle pressure of 100 pounds per square inch, with a throughput of 2,044 pounds per hour, and no control.
- (d) One (1) Pangborn blast machine, identified as #1 Blast and constructed in 2002, with a maximum abrasive input of 120,000 pounds of black beauty per hour, controlled by a dust collector (#2 BDC), and venting inside the building.
- (e) One (1) plasma/oxy-fuel drill machine, identified as #3 OFD and constructed in 2002, with a maximum cutting rate of 600 inches per hour for 2 inches thick steel, controlled by a dust collector (#4 TD), and venting inside the building.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]
[326 IAC 2-7-5(15)]

This stationary source does not currently have any insignificant activities, as defined in 326 IAC 2-7-1(21).

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION B

GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-7-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-7) shall prevail.

B.2 Permit Term [326 IAC 2-7-5(2)] [326 IAC 2-1.1-9.5]

This permit is issued for a fixed term of five (5) years from the original date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

B.3 Enforceability [326 IAC 2-7-7]

Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

B.4 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

B.5 Severability [326 IAC 2-7-5(5)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.6 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

This permit does not convey any property rights of any sort or any exclusive privilege.

B.7 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)] [326 IAC 2-7-6(6)]

- (a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit or, for information claimed to be confidential, the Permittee may furnish such records directly to the U. S. EPA along with a claim of confidentiality. [326 IAC 2-7-5(6)(E)]

- (c) The Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.8 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]

- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for:
 - (1) Enforcement action;
 - (2) Permit termination, revocation and reissuance, or modification; or
 - (3) Denial of a permit renewal application.
- (b) Noncompliance with any provision of this permit, except any provision specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act.
- (c) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
- (d) An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

B.9 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by a responsible official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

B.10 Annual Compliance Certification [326 IAC 2-7-6(5)]

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than April 15 of each year to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
 - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was continuous or intermittent;
 - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and
 - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ, may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

B.11 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)]
[326 IAC 1-6-3]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, including the following information on each facility:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If, due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

The PMP and the PMP extension notification do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or contributes to any violation. The PMP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (d) Records of preventive maintenance shall be retained for a period of at least five (5) years. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

B.12 Emergency Provisions [326 IAC 2-7-16]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
 - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
 - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, and Northwest Regional Office within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section), or
Telephone Number: 317-233-5674 (ask for Compliance Section)
Facsimile Number: 317-233-5967
Telephone Number: 1-888-209-8892, or
Telephone Number : 219-245-4870
Facsimile Number: 219-881-6745
 - (5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(10) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
- (g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

B.13 Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]

- (a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.

- (b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.
- (d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
 - (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
 - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
 - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
 - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (f) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(7)]

B.14 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either
 - (1) Incorporated as originally stated,
 - (2) Revised, or
 - (3) Deletedby this permit.
- (b) All previous registrations and permits are superseded by this permit.

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

-
- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.
- (c) Emergencies shall be included in the Quarterly Deviation and Compliance Monitoring Report.

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination
[326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ, determines any of the following:
- (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.17 Permit Renewal [326 IAC 2-7-4]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ, and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

- (b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]

- (1) A timely renewal application is one that is:

- (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
- (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

- (2) If IDEM, OAQ, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

- (c) Right to Operate After Application for Renewal [326 IAC 2-7-3]

If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, any additional information identified as being needed to process the application.

- (d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]

If IDEM, OAQ, fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

B.18 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

- (a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application shall be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.19 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)]
[326 IAC 2-7-12 (b)(2)]

- (a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.
- (b) Notwithstanding 326 IAC 2-7-12(b)(1)(D)(i) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.20 Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:
 - (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
 - (2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;
 - (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
 - (4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

- (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20(b), (c), or (e) and makes such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, in the notices specified in 326 IAC 2-7-20(b), (c)(1), and (e)(2).

- (b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

- (1) A brief description of the change within the source;
- (2) The date on which the change will occur;
- (3) Any change in emissions; and
- (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.

B.21 Source Modification Requirement [326 IAC 2-7-10.5]

A modification, construction, or reconstruction is governed by 326 IAC 2 and 326 IAC 2-7-10.5.

B.22 Inspection and Entry [326 IAC 2-7-6] [IC 13-14-2-2]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

- (b) Have access to and copy any records that must be kept under the conditions of this permit;
- (c) Inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.23 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The application which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

- (a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ, the applicable fee is due April 1 of each year.
- (b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAQ, Technical Support and Modeling Section), to determine the appropriate permit fee.

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards [326 IAC 2-7-5(1)]

C.1 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of twenty percent (20%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.2 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.

C.3 Incineration [326 IAC 4-2] [326 IAC 9-1-2]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2. 326 IAC 9-1-2 is not federally enforceable.

C.4 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

C.5 Lake County Particulate Matter Contingency Measures [326 IAC 6-1-11.2]

The Permittee shall comply with the applicable provisions of 326 IAC 6-1-11.2 (Lake County Particulate Matter Contingency Measures).

C.6 Operation of Equipment [326 IAC 2-7-6(6)]

Except as otherwise provided by statute or rule, or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

C.7 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted. The provisions of 326 IAC 1-7-2, 326 IAC 1-7-3(c) and (d), 326 IAC 1-7-4(d), (e), and (f), and 326 IAC 1-7-5(d) are not federally enforceable.

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least

thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
 - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
 - (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Indiana Accredited Asbestos Inspector**
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited, pursuant to the provisions of 40 CFR 61, Subpart M, is federally enforceable.

Testing Requirements [326 IAC 2-7-6(1)]

C.9 Performance Testing [326 IAC 3-6]

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the source submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.10 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]

C.11 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units or emission units added through a source modification shall be implemented when operation begins.

C.12 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63, or other approved methods as specified in this permit.

C.13 Maintenance of Emission Monitoring Equipment [326 IAC 2-7-5(3)(A)(iii)]

- (a) In the event that a breakdown of the emission monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem. To the extent practicable, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less frequent than required in Section D of this permit until such time as the monitoring equipment is back in operation. In the case of continuous monitoring, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less often than once an hour until such time as the continuous monitor is back in operation.
- (b) The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors and related equipment. In addition, prompt corrective action shall be initiated whenever indicated.

C.14 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

- (a) Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ($\pm 2\%$) of full scale reading.
- (b) The Permittee may request the IDEM, OAQ approve the use of a pressure gauge or other instrument that does not meet the above specifications provided the Permittee can demonstrate an alternative pressure gauge or other instrument specification will adequately ensure compliance with permit conditions requiring the measurement of pressure drop or other parameters.

Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

C.15 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

- (a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.
- (b) These ERPs shall be submitted for approval to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within ninety (90) days after the date of issuance of this permit.

- (c) If the ERP is disapproved by IDEM, OAQ, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.
- (d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.
- (e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.
- (f) Upon direct notification by IDEM, OAQ, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.16 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall submit:

- (a) A compliance schedule for meeting the requirements of 40 CFR 68; or
- (b) As a part of the annual compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP);

All documents submitted pursuant to this condition shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.17 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-7-5] [326 IAC 2-7-6]

- (a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, supplemented from time to time by the Permittee, maintained on site, and comprised of:
 - (1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected timeframe for taking reasonable response steps.
 - (2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.
- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:

- (1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or
 - (2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.
 - (3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, the IDEM, OAQ shall be promptly notified of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.
 - (4) Failure to take reasonable response steps shall constitute a violation of the permit.
- (c) The Permittee is not required to take any further response steps for any of the following reasons:
- (1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.
 - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for a minor permit modification to the permit, and such request has not been denied.
 - (3) An automatic measurement was taken when the process was not operating.
 - (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.
- (d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.
- (e) The Permittee shall record all instances when response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
- (f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

C.18 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]
[326 IAC 2-7-6]

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of

the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.

- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The documents submitted pursuant to this condition do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

C.19 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)] [326 IAC 2-6]

- (a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by April 15 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:

- (1) Indicate estimated actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);
- (2) Indicate estimated actual emissions of other regulated pollutants (as defined by 326 IAC 2-7-1) from the source, for purposes of Part 70 fee assessment.

- (b) The annual emission statement covers the twelve (12) consecutive month time period starting December 1 and ending November 30. The annual emission statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

The emission statement does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

C.20 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

- (a) Records of all required data, reports and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the

Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.21 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

- (a) The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (e) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years.

Stratospheric Ozone Protection

C.22 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
- (b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

- (a) One (1) paint booth, coating structural steel, constructed in 1960, with a maximum capacity of 12.0 gallons of coating per hour, utilizing airless spray, with no control;

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 PSD Minor Limit [326 IAC 2-2]

The solids content of the coatings, primers, thinners, and cleaners inputted to the paint booth shall be limited to less than two hundred (200) tons per twelve (12) consecutive month period with compliance determined at the end of each month. This is equivalent to limiting the particulate emissions, both PM and PM10, from the paint booth to less than fifty (50) tons per year.

This requirement and the requirement in Condition D.2.2 limit particulate emissions such that when including the particulate emissions from the other units at the source, the total source emissions remain below two hundred fifty (250) tons per year. Therefore the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) are not applicable.

D.1.2 Emission Offset Minor Limit [326 IAC 2-3]

The VOC content of the coatings, primers, thinners, and cleaners inputted to the paint booth shall be limited to less than twenty-four and five-tenths (24.5) tons per twelve (12) consecutive month period. This limit is structured such that when including the VOC emissions from combustion, the source total VOC emissions remain below twenty-five (25) tons per year. Therefore the requirements of 326 IAC 2-3 (Emission Offset) are not applicable.

D.1.3 Particulate Matter (PM) [326 IAC 6-1-2(a)]

Pursuant to 326 IAC 6-1-2(a) (Nonattainment Area Particulate Limitations), particulate matter (PM) emissions from the paint booth shall be limited to 0.03 grain per dry standard cubic foot.

D.1.4 VOC Requirements [326 IAC 8-7]

326 IAC 8-7 (Specific VOC Reduction Requirements for Lake, Porter, Clark, and Floyd Counties) applies to this source because the source is in Lake County and the coating facility at the source has the potential to emit greater than ten (10) tons per year of VOC. However, as specified in 326 IAC 8-7-2(b), no emissions standards or limitations exist because the paint booth would be subject to 326 IAC 8-2, but actual emissions are below the applicability levels of the rules. Certification, record keeping, and reporting requirements do apply to this source and they are listed in the Record Keeping and Reporting Requirements section of this permit.

D.1.5 Volatile Organic Compounds (VOC) [326 IAC 8-2-9]

326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), does not apply to this source because its actual emissions are below fifteen (15) pounds per day.

Any change or modification which may increase the actual emissions of VOC to above fifteen (15) tons per twelve (12) consecutive month period must be approved by the Office of Air Quality before any such change may occur.

D.1.6 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.

Compliance Determination Requirements

D.1.7 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Condition D.1.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer.

D.1.8 VOC Emissions

Compliance with Condition D.1.2 shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound usage for the twelve (12) month period.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.1.9 Monitoring

- (a) Monthly inspections shall be performed of the coating emissions and the presence of overspray on the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.
- (b) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.10 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.1, D.1.2, and D.1.5 the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the PM, PM10 and VOC usage limits and/or the PM, PM10, and VOC emission limits established in Conditions D.1.1, D.1.2, and D.1.5. (Assume PM and PM10 are equal).
 - (1) The amount and VOC and solids content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (2) A log of the dates of use;
 - (3) The cleanup solvent usage for each month;
 - (4) The total VOC and solids usage for each month; and
 - (5) The weight of VOCs and particulates emitted for each compliance period.

- (b) To document compliance with Condition D.1.9, the Permittee shall maintain a log of monthly overspray observations and those additional inspections prescribed by the Preventive Maintenance Plan.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.11 Reporting Requirements

- (a) A quarterly summary of the information to document compliance with Conditions D.1.1 and D.1.2 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) To document compliance with 326 IAC 8-7-6, the source shall submit to the department a certification that the paint booth is exempt from the requirements of 326 IAC 8-7-3. The certification shall contain all of the following information:
 - (1) The name and address of the source and the name and telephone number of the company representative.
 - (2) Identification of each VOC emitting facility together with a description of the purpose each facility serves.
 - (3) A listing of facilities which meet the requirements of 326 IAC 8-7-2(a).
 - (4) Baseline actual emissions for each facility identified in subdivision (3) together with the following information:
 - (A) Maximum design rate, maximum production, or maximum throughput.
 - (B) VOC emission factors with reference to the source of the emission factors and procedures as to how the emission factors were estimated, for example, the type of each fuel or process chemicals used and the baseline year used.
 - (5) Procedures that will be used to monitor the source's potential emissions to ensure that they remain below twenty-five (25) tons per year.

SECTION D.2

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

- (b) One (1) welding/flare-cutting operation, constructed in 1972, consisting of three (3) submerged arc welding stations with a maximum capacity of 18 inches of wire per minute, four (4) metal inert gas welding stations with a maximum hourly capacity of 22 inches of wire per minute; seventeen (17) stick welding stations with a maximum of 40 electrodes per hour, and (1) propane flare-cutting station with a maximum cutting rate of 12 inches per minute;
- (c) One (1) blasting operation, originally constructed in 1970 using sand as the abrasive, modified in 1987 to use Black Beauty Grit, with a nozzle internal diameter of 0.5 inches and a nozzle pressure of 100 pounds per square inch, with a throughput of 2,044 pounds per hour, and no control.
- (d) One (1) Pangborn blast machine, identified as #1 Blast and constructed in 2002, with a maximum abrasive input of 120,000 pounds of black beauty per hour, controlled by a dust collector (#2 BDC), and venting inside the building.
- (e) One (1) plasma/oxy-fuel drill machine, identified as #3 OFD and constructed in 2002, with a maximum cutting rate of 600 inches per hour for 2 inches thick steel, controlled by a dust collector (#4 TD), and venting inside the building.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.2.1 Particulate Matter (PM) [326 IAC 6-1-2(a)]

Pursuant to 326 IAC 6-1-2(a)(Nonattainment Area Particulate Limitations), particulate matter (PM) emissions from the listed facilities shall be limited to 0.03 grain per dry standard cubic foot.

D.2.2 PSD Minor Limit [326 IAC 2-2]

The PM and PM10 emissions from the Pangborn blast machine (#1 Blast) and the plasma/oxy-fuel drill machine (# OFD) shall not exceed the emission limits listed in the table below:

Units	PM Emission Limit (lbs/hr)	PM10 Emission Limit (lbs/hr)
Pangborn Blast Machine	1.5 lbs/hr	1.5 lbs/hr
Plasma/Oxy-fuel Drill Machine	0.1 lbs/hr	0.1 lbs/hr

This is equivalent to 7.0 tons/yr of PM/PM10 emissions. Combined with Condition D.1.1 and the PM/PM10 emissions from other units, the PM/PM10 emissions from the entire source are limited to less than 250 tons per year. Therefore the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and are not applicable.

D.2.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and its control device.

Compliance Determination Requirements

D.2.4 Particulate Matter (PM)

In order to comply with Condition D.2.1 and D.2.2, the dust collector for PM control shall be in operation and control emissions from the Pangborn blast machine (#1 Blast) and the plasma/oxy-fuel drill machine (#3 OFD) at all times that Pangborn blast machine (#1 Blast) and the plasma/oxy-fuel drill machine (#3 OFD) are in operation.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.2.5 Visible Emissions Notations

- (a) Once per shift visible emission notations of the Pangborn blast machine (#1 Blast) and the plasma/oxy-fuel drill machine (#3 OFD) stack exhausts shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

D.2.6 Parametric Monitoring

The Permittee shall record the total static pressure drop across the dust collectors used in conjunction with the Pangborn blast machine (#1 Blast) and the plasma/oxy-fuel drill machine (#3 OFD), at least once per shift when the Pangborn blast machine (#1 Blast) and the plasma/oxy-fuel drill machine (#3 OFD) are in operation when venting to the atmosphere. When for any one reading, the pressure drop across the dust collector is outside the normal range of 3.0 and 6.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Compliance Response Plan - Preparation, Implementation, Records, and Reports. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

The instrument used for determining the pressure drop shall comply with Section C - Pressure Gauge and Other Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

D.2.7 Baghouse Inspections

An inspection shall be performed each calendar quarter of all bags controlling the Pangborn blast machine (#1 Blast) and the plasma/oxy-fuel drill machine (#3 OFD) when venting to the

atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. Inspections required by this condition shall not be performed in consecutive months. All defective bags shall be replaced.

D.2.8 Broken or Failed Bag Detection

In the event that bag failure has been observed:

- (a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if there are no visible emissions or if the event qualifies as an emergency and the Permittee satisfies the emergency provisions of this permit (Section B- Emergency Provisions). Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Response Plan - Implementation, Preparation, Records, and Reports, shall be considered a violation of this permit.
- (b) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.2.9 Record Keeping Requirements

- (a) To document compliance with Condition D.2.5, the Permittee shall maintain records of once per shift visible emission notations of the Pangborn blast machine (#1 blast) and the plasma/oxy-fuel drill machine (#3 OFD) stack exhausts.
- (b) To document compliance with Condition D.2.6, the Permittee shall maintain once per shift records of the inlet and outlet pressure drop during normal operation when venting to the atmosphere.
- (c) To document compliance with Condition D.2.7, the Permittee shall maintain records of the results of the inspections required under Condition D.2.7 and the dates the vents are redirected.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY

PART 70 OPERATING PERMIT CERTIFICATION

Source Name: Munster Steel Co., Inc.
Source Address: 9505 Calumet Ave., Munster, Indiana 46321
Mailing Address: 9505 Calumet Ave., Munster, Indiana 46321
Part 70 Permit No.: T089-4292-00090

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

? Annual Compliance Certification Letter

? Test Result (specify) _____

? Report (specify) _____

? Notification (specify) _____

? Affidavit (specify) _____

? Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Phone:

Date:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH
100 North Senate Avenue
P.O. Box 6015
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967

PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT

Source Name: Munster Steel Co., Inc.
Source Address: 9505 Calumet Ave., Munster, Indiana 46321
Mailing Address: 9505 Calumet Ave., Munster, Indiana 46321
Part 70 Permit No.: T089-4292-00090

This form consists of 2 pages

Page 1 of 2

- ? This is an emergency as defined in 326 IAC 2-7-1(12)
- ? The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
 - ? The Permittee must submit notice in writing or by facsimile within two (2) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16.

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:

Control Equipment:

Permit Condition or Operation Limitation in Permit:

Description of the Emergency:

Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A

Page 2 of 2

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

A certification is not required for this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

Part 70 Quarterly Report

Source Name: Munster Steel Co., Inc.
Source Address: 9505 Calumet Ave., Munster, Indiana 46321
Mailing Address: 9505 Calumet Ave., Munster, Indiana 46321
Part 70 Permit No.: T089-4292-00090
Facility: Paint Booth
Parameter: Solids content
Limit: The source shall limit the solids content of the coatings, primers, thinners, and cleaners inputted to the paint booth to less than two hundred (200) tons per twelve (12) consecutive month period with compliance determined at the end of each month. This is equivalent to limiting the particulate emissions, both PM and PM10, from the paint booth to less than fifty (50) tons per year.

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

? No deviation occurred in this quarter.

? Deviation/s occurred in this quarter.

Deviation has been reported on: _____

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

Munster Steel Co., Inc.
Munster, Indiana
Permit Reviewer: ERG/KC

1st Significant Permit Modification No.: 089-17252-00090
Modified by: ERG/YC

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**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

Part 70 Quarterly Report

Source Name: Munster Steel Co., Inc.
Source Address: 9505 Calumet Ave., Munster, Indiana 46321
Mailing Address: 9505 Calumet Ave., Munster, Indiana 46321
Part 70 Permit No.: T089-4292-00090
Facility: Paint Booth
Parameter: VOC content
Limit: The source shall limit the VOC content of the coatings, primers, thinners, and cleaners inputted to the paint booth to less than twenty-four and five-tenths (24.5) tons per twelve (12) consecutive month period. This is equivalent to limiting source wide VOC emissions to less than twenty-five (25) tons per year.

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

? No deviation occurred in this quarter.

? Deviation/s occurred in this quarter.

Deviation has been reported on: _____

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

Munster Steel Co., Inc.
Munster, Indiana
Permit Reviewer: ERG/KC

1st Significant Permit Modification No.: 089-17252-00090
Modified by: ERG/YC

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**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Munster Steel Co., Inc.
Source Address: 9505 Calumet Ave., Munster, Indiana 46321
Mailing Address: 9505 Calumet Ave., Munster, Indiana 46321
Part 70 Permit No.: T089-4292-00090

Months: _____ to _____ Year: _____

Page 1 of 2

This report is an affirmation that the source has met all the requirements stated in this permit. This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

? NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

? THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

Permit Requirement (specify permit condition #)

Date of Deviation:

Duration of Deviation:

Number of Deviations:

Probable Cause of Deviation:

Response Steps Taken:

Permit Requirement (specify permit condition #)

Date of Deviation:

Duration of Deviation:

Number of Deviations:

Probable Cause of Deviation:

Response Steps Taken:

Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Form Completed By: _____

Title/Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management Office of Air Quality

Addendum to the Technical Support Document (TSD) for a Part 70 Significant Permit Modification

Source Background and Description

Source Name:	Munster Steel Co., Inc.
Source Location:	9505 Calumet Ave., Munster, Indiana 46321
County:	Lake
SIC Code:	3441
Operation Permit No.:	T089-4292-00090
Operation Permit Issuance Date:	March 25, 2002
Significant Permit Modification No.:	089-17252-00090
Permit Reviewer:	ERG/YC

On January 6, 2004, the Office of Air Quality (OAQ) had a notice published in The Times and Post Tribune in Munster, Indiana stating that Munster Steel Co., Inc. had applied for a Part 70 Significant Permit Modification to operate a new blast machine and a new drill machine. The notice also stated that OAQ proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

Upon further review, the OAQ has decided to make the following revisions to the permit. Language with a line through it has been deleted and new language is in bold.

1. For clarification purposes, the quarterly report form for the solids content limit has been revised as follows:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY COMPLIANCE DATA SECTION

Part 70 Quarterly Report

Source Name:	Munster Steel Co., Inc.
Source Address:	9505 Calumet Ave., Munster, Indiana 46321
Mailing Address:	9505 Calumet Ave., Munster, Indiana 46321
Part 70 Permit No.:	T089-4292-00090
Facility:	Paint Booth
Parameter:	Solids content
Limit:	The source shall limit the solids content of the coatings, primers, thinners, and cleaners inputted to the paint booth to less than two hundred (200) tons per twelve

(12) consecutive month period with compliance determined at the end of each month. This is equivalent to limiting the particulate emissions, **both PM and PM10**, from the paint booth to less than fifty (50) tons per year.

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

? No deviation occurred in this quarter.

? Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management Office of Air Quality

Technical Support Document (TSD) for a Part 70 Minor Source Modification and a Part 70 Significant Permit Modification

Source Background and Description

Source Name:	Munster Steel Co., Inc.
Source Location:	9505 Calumet Ave., Munster, Indiana 46321
County:	Lake
SIC Code:	3441
Operation Permit No.:	T089-4292-00090
Operation Permit Issuance Date:	March 25, 2002
Significant Permit Modification No.:	089-17252-00090
Minor Source Modification No.:	089-18431-00090
Permit Reviewer:	ERG/YC

The Office of Air Quality (OAQ) has reviewed a modification application from Munster Steel Co., Inc., relating to the operation of the following emission units and pollution control devices:

- (d) One (1) Pangborn blast machine, identified as #1 Blast and constructed in 2002, with a maximum abrasive input of 120,000 pounds of black beauty per hour, controlled by a dust collector (#2 BDC), and venting inside the building.
- (e) One (1) plasma/oxy-fuel drill machine, identified as #3 OFD and constructed in 2002, with a maximum cutting rate of 600 inches per hour for 2 inches thick steel, controlled by a dust collector (#4 TD), and venting inside the building.

History

On April 21, 2003, Munster Steel Co., Inc. submitted an application to the OAQ requesting to add a Pangborn blast machine (#1 Blast) and a plasma/oxy-fuel drill machine (#3 OFD) with dust collectors for control to their Title V permit. These units were constructed in 2002 and started operating in 2002 without getting an air approval. The source also requested to remove the existing wheelabrator shot-blaster because this unit was replaced by the new Pangborn blast machine.

Munster Steel Co., Inc. is an existing structure and miscellaneous steel fabricating plant. A Part 70 Permit (T089-4292-00090) was issued to this source on March 25, 2002. The existing source is a PSD minor source with PM and PM10 emissions each limited to less than 250 tons/yr and the actual PM/PM10 emissions from the entire source have never exceeded 100 tons/yr. The source would like to maintain their PSD minor source status. Therefore, the PM/PM10 emissions for the existing units will be adjusted so that the PM/PM10 emissions from the entire source are still limited to less than the 250 tons/yr after this modification.

Enforcement Issue

- (a) IDEM is aware that equipment has been constructed and operated prior to receipt of the proper permit.
- (b) IDEM is reviewing this matter and will take appropriate action. This proposed approval is intended to satisfy the requirements of the construction permit rules.

Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (°F)
#1	Dust Collector #2 BDC	15.3	0.5	unknown	70
#2	Dust Collector #4 TD	16.0	0.5	unknown	unknown

Recommendation

The staff recommends to the Commissioner that the Part 70 Minor Source Modification and the Part 70 Significant Permit Modification be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on April 21, 2003. Additional information was received on May 15, 2003.

Emission Calculations

See Appendix A of this document for detailed emissions calculations (pages 1 and 2).

Potential To Emit of Modification

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA.”

This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	5,307
PM-10	3,730
SO ₂	--
VOC	--
CO	--
NO _x	--

HAP's	Potential To Emit (tons/year)
Manganese	0.16
Nickel	0.03
Chromium	0.09
TOTAL	0.28

Justification for Modification

This modification is being performed through a Part 70 Minor Source Modification pursuant to 326 IAC 2-7-10.5(d)(5)(C) as the potential to emit PM and PM10 is each limited to less than 25 tons per year by using dust collectors with at least 99% control efficiencies and no visible emissions. This modification is being performed through a Part 70 Significant Permit Modification pursuant to 326 IAC 2-7-12(d) because the source is seeking to establish Part 70 permit conditions to make the 326 IAC 2-2 (PSD) requirements not applicable.

County Attainment Status

The source is located in Lake County.

Pollutant	Status
PM-10	Moderate Nonattainment*
SO ₂	Primary Nonattainment
NO ₂	Attainment
Ozone	Severe Nonattainment
CO	Maintenance Attainment
Lead	Attainment

*Note: Lake County has been federally redesignated in 40 CFR 81.315 as attainment for PM10. The Air Pollution Control Board will be making the same redesignation in the state rules.

- (a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Lake County has been designated as severe nonattainment for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Emission Offset, 326 IAC 2-3.
- (b) Lake County has been designated as nonattainment for SO₂. Therefore, SO₂ emissions were reviewed pursuant to the requirements for Emission Offset, 326 IAC 2-3.
- (c) Part of Lake County has been designated as nonattainment for PM10. However, this source is located at Munster in Lake County, which was not included in the nonattainment area for PM10. Therefore, PM10 emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (d) Lake County has been classified as attainment for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (e) Fugitive Emissions
Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD and Emission Offset applicability.

Source Status

Existing Source PSD or Emission Offset Definition (emissions after controls, based upon 8760 hours of operation per year at rated capacity and/or as otherwise limited):

Pollutant	Emissions (tons/year)
PM	Less than 250
PM-10	Less than 250
SO ₂	Negligible
VOC	Less than 25.0
CO	0.8
NO _x	0.9

- (a) This existing source is a not a PSD major stationary source because no attainment regulated pollutants (PM, PM10, CO, and NO_x) is emitted at a rate of 250 tons per year or more, and it is not in one of the 28 listed source categories.
- (b) This existing source is a not an Emission Offset major stationary source because VOC is not emitted at a rate of 25 tons per year or more and SO₂ is not emitted at a rate of 100 tons per year or more. This source is not in one of the 28 listed source categories.
- (c) These emissions are based upon the Technical Support Document (TSD) for the source's Part 70 permit (T089-4292-00090), issued on May 25, 2002.

Potential to Emit of Modification After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units after controls. The control equipment is considered federally enforceable only after issuance of this Part 70 permit modification.

	Potential to Emit (tons/year)						
Process/facility	PM	PM-10	SO ₂	VOC	CO	NO _x	HAPs
Pangborn Blast Machine	Less than 6.57	Less than 6.57	--	--	--	--	--
Plasma/Oxy-fuel Drill Machine	Less than 0.44	Less than 0.44	--	--	--	--	0.28
Total Emission of This Modification	Less than 7.01	Less than 7.01	--	--	--	--	0.28
* Existing Paint Room	**Less than 149 50.0	**Less than 149 50.0	--	Less than 24.5	--	--	Less than 25.0
*Other Existing Units	100	100	Negligible	0.1	0.8	0.9	Negligible
Total Emissions of the Entire Source After Modification	Less than 157	Less than 157	Negligible	Less than 24.6	0.80	0.90	Less than 25.3

	Potential to Emit (tons/year)						
Process/facility	PM	PM-10	SO ₂	VOC	CO	NO _x	HAPs
PSD and Emission Offset Thresholds	250	250	100	25	250	250	NA

Note: (*)The PTE of the existing units are from the TSD of the source's Part 70 Permit (#089-4292-00090, issued on March 25, 2002).

(**) The source would like to maintain their PSD minor source status. Therefore, the PTE of PM/PM10 of the existing paint booth has been adjusted to less than 50 tons/yr.

- (a) This modification to an existing minor stationary source is not major because the potential to emit from this unit is less than PSD and Emission Offset significant thresholds. In addition, the source will maintain their PSD minor and Emission Offset minor source status after this modification. Therefore, pursuant to 326 IAC 2-2 and 326 IAC 2-3, the PSD and Emission Offset requirements do not apply.
- (b) The PM and PM10 emissions from the this modification project are each limited to less than 7.01 tons/yr. This is attained by the use of dust collectors to control the PM/PM10 emissions from the proposed blast machine and the drill machine.

Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this modification.
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 63) applicable to this modification.
- (c) This modification does involve a pollutant-specific emissions unit (Pangborn blast machine):
 - (1) with the potential to emit before controls equal to or greater than one hundred (100) tons per year, and
 - (2) that is subject to an emission limit and has a control device that is necessary to meet that limit.

Therefore, the Pangborn blast machine in this modification is subject to 40 CFR Part 64 - Compliance Assurance Monitoring (CAM). Since the source's Part 70 permit application was filed and determined complete before April 20, 1998, the CAM plan for this unit shall be submitted with the first Part 70 permit renewal application and the CAM requirements will be included in the first Part 70 renewal permit.

State Rule Applicability - Entire Facility

326 IAC 2-3 (Emission Offset)

This existing source is located in Lake County (nonattainment area for Ozone and SO₂) and has potential to emit SO₂ less than 100 tons/yr. The VOC emissions from the existing source were limited to less than 25 ton/yr in the source's Part 70 permit (T089-4292-00090, issued on March 25, 2002). Therefore, this source is an existing Emission Offset minor source.

There is no SO₂ or VOC emissions from this modification. Therefore, the source will maintain the Emission Offset minor source status after this modification, and the requirements of 326 IAC 2-3 are not applicable.

326 IAC 2-2 (Prevention of Significant Deterioration (PSD))

This source was constructed in 1960 and modified in 1970, 1972, 1990 and 2002 (this modification). This source is not 1 of 28 source categories defined in 326 IAC 2-2-1(p)(1) and has PM/PM10 emissions before control greater than 250 tons/yr. Pursuant to the source's Part 70 permit (T089-4292-00090, issued on March 25, 2002), the PM and PM10 emissions from the entire source were each limited to less than 250 tons/yr. Therefore, the existing source is a PSD minor source.

The potential to emit PM/PM10 before control from this modification is greater than 250 ton/yr. The source have accepted the following emission limits:

Units	PM Emission Limit (lbs/hr)	PM10 Emission Limit (lbs/hr)
Pangborn Blast Machine	1.5 lbs/hr	1.5 lbs/hr
Plasma/Oxy-fuel Drill Machine	0.1 lbs/hr	0.1 lbs/hr

This is equivalent to 7.0 tons/yr of PM/PM10 emissions. According to the emission calculations in Appendix A, the potential to emit PM/PM10 is less than the emission limits in the table above. Compliance with the emission limits above ensures that the PM/PM10 emissions from this modification are less than 250 tons/yr. Therefore, the requirements of 326 IAC 2-2 are not applicable to this modification.

Pursuant to Condition D.1.1 in the source's Title V permit (#089-4292-00090, issued on March 25, 2002), the solid content of the coatings, primers, thinners, and cleaners input to the paint booth shall be limited to less than 596 tons per twelve (12) consecutive month period, which is equivalent to 149 tons/yr of PM/PM10 emissions. The source proposed lower this solid content limit to less than 200 tons per twelve (12) consecutive month period, which is equivalent to 50 tons/yr of PM/PM10 emissions. Therefore, the potential to emit PM/PM10 emissions from the entire source after this modification will still be less than 250 tons/yr, and this source will maintain the PSD minor source status.

326 IAC 2-4.1 (New Sources of Hazardous Air Pollutants)

This source was constructed in 1960 and modified in 1970, 1972, 1990 and 2002 (this modification). The potential to emit HAPs from this modification is less than 10 tons/yr for a single HAP and less than 25 tons/yr for any combination of HAPs. Therefore, the requirements of 326 IAC 2-4.1 are not applicable to this modification.

326 IAC 5-1 (Opacity Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity for sources located in Lake County shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of twenty percent (20%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9

or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

State Rule Applicability - Pangborn Blast Machine (#1 Blast) and Drill Machine (#3 OFD)

326 IAC 6-1-2(a)(Nonattainment Area Particulate Limitations)

This source is located in Lake County, but is not one of the sources listed under 326 IAC 6-1-8.1 through 326 IAC 6-1-18. Therefore, the Pangborn blast machine (#1 Blast) and the drill machine (#3 OFD) are subject to the requirements of 326 IAC 6-1-2(a)(Nonattainment Area Particulate Limitations), and the PM emissions from the each of the proposed blast machine (#1 Blast) and the drill machine (#3 OFD) shall not exceed 0.03 grains per dry standard cubic foot (dscf) of exhaust air.

326 IAC 6-3 (Process Operations)

The Pangborn blast machine (#1 Blast) and the drill machine (#3 OFD) are subject to the requirements contained in 326 IAC 6-1-2(a)(Nonattainment Area Particulate Limitations). Therefore, these emission units are exempt from the requirements of 326 IAC 6-3, pursuant to 326 IAC 6-3-1(b)(1).

Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

1. The Pangborn blast machine (#1 Blast) has applicable compliance monitoring conditions as specified below:
 - (a) Visible emissions notations of the stack exhaust of the proposed blast machine (#1 Blast) shall be performed once per shift during normal daylight operations when venting to the atmosphere. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Compliance Response Plan for

this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

- (b) The Permittee shall monitor and record the pressure drop for the dust collector (#2 BDC) used in conjunction with the Pangborn blast machine (#1 Blast), at least once per shift when the Pangborn blast machine (#1 Blast) is in operation and venting to the atmosphere. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the scrubber shall be maintained within the range of 3.0 to 6.0 inches of water, or a range established during the latest compliant stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside the above mention range.
- (c) An inspection shall be performed each calendar quarter of all bags controlling the Pangborn blast machine (#1 Blast). Inspections required by this condition shall not be performed in consecutive months. Inspections are optional when venting indoors. All defective bags shall be replaced. All defective bags shall be replaced. In the event that bag failure has been observed:
 - (1) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if there are no visible emissions or if the event qualifies as an emergency and the Permittee satisfies the emergency provisions of this permit.
 - (2) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit.

These monitoring conditions are necessary because dust collector #2 BDC, which is equipped with the blast machine (#1 Blast), must operate properly to ensure compliance with 326 IAC 2-2 (PSD), and 326 IAC 6-1-2(a)(Nonattainment Area Particulate Limitations).

- 2. The plasma/oxy-fuel drill machine (#3 OFD) has applicable compliance monitoring conditions as specified below:
 - (a) Visible emissions notations of the stack exhaust of the drill machine (#3 OFD) shall be performed once per shift during normal daylight operations when venting to the atmosphere. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.
 - (b) The Permittee shall monitor and record the pressure drop for the dust collector (#4 TD) used in conjunction with the drill machine (#3 OFD), at least once per shift

when the drill machine (#3 OFD) is in operation and venting to the atmosphere. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the scrubber shall be maintained within the range of 3.0 to 6.0 inches of water, or a range established during the latest compliant stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside the above mention range.

- (c) An inspection shall be performed each calendar quarter of all bags controlling the drill machine (#3 OFD). Inspections required by this condition shall not be performed in consecutive months. Inspections are optional when venting indoors. All defective bags shall be replaced. All defective bags shall be replaced. In the event that bag failure has been observed:
- (1) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if there are no visible emissions or if the event qualifies as an emergency and the Permittee satisfies the emergency provisions of this permit.
 - (2) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit.

These monitoring conditions are necessary because dust collector #4 TD, which is equipped with the drill machine (#3 OFD), must operate properly to ensure compliance with 326 IAC 2-2 (PSD), and 326 IAC 6-1-2(a)(Nonattainment Area Particulate Limitations).

Proposed Changes

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)]

The Permittee owns and operates a stationary structural and miscellaneous steel fabricating plant.

Responsible Official:	Ronald Robbins President
Source Address:	9505 Calumet Ave., Munster, Indiana 46321
Mailing Address:	9505 Calumet Ave., Munster, Indiana 46321
General Source Phone Number:	(219) 924-5198
SIC Code:	3441
County Location:	Lake
Source Location Status:	Nonattainment for SO₂ SO₂ and ozone
	Attainment for all other criteria pollutants
Source Status:	Part 70 Permit Program
	Minor Source, under PSD and Emission Offset Rules;
	Not 1 of 28 Source Categories

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

- ~~(c) One (1) wheelabrator shot blaster, constructed in 1990, with a blast rate of 20,000 pounds per hour of steel shot, equipped with a dust collector to control particulate emissions; and~~

- (dc) One (1) blasting operation, originally constructed in 1970 using sand as the abrasive, modified in 1987 to use Black Beauty Grit, with a nozzle internal diameter of 0.5 inches and a nozzle pressure of 100 pounds per square inch, with a throughput of 2,044 pounds per hour, and no control.
- (d) **One (1) Pangborn blast machine, identified as #1 Blast and constructed in 2002, with a maximum abrasive input of 120,000 pounds of black beauty per hour, controlled by a dust collector (#2 BDC), and venting inside the building.**
- (e) **One (1) plasma/oxy-fuel drill machine, identified as #3 OFD and constructed in 2002, with a maximum cutting rate of 600 inches per hour for 2 inches thick steel, controlled by a dust collector (#4 TD), and venting inside the building.**

D.1.1 PSD Minor Limit [326 IAC 2-2] ~~{40 CFR 52.21}~~

The solids content of the coatings, primers, thinners, and cleaners inputted to the paint booth shall be limited to less than ~~five hundred ninety-six (596)~~ **two hundred (200)** tons per twelve (12) consecutive month period **with compliance determined at the end of each month.** This is equivalent to limiting the particulate emissions, both PM and PM10, from the paint booth to less than ~~one hundred forty-nine (149)~~ **fifty (50)** tons per year.

This requirement and the requirement in Condition D.2.2 limit particulate emissions such that when including the particulate emissions from the other units at the source, the total source emissions remain below two hundred fifty (250) tons per year. Therefore the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) ~~and 40 CFR 52.21~~ are not applicable.

SECTION D.2

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

- (b) One (1) welding/flame-cutting operation, constructed in 1972, consisting of three (3) submerged arc welding stations with a maximum capacity of 18 inches of wire per minute, four (4) metal inert gas welding stations with a maximum hourly capacity of 22 inches of wire per minute; seventeen (17) stick welding stations with a maximum of 40 electrodes per hour, and (1) propane flame-cutting station with a maximum cutting rate of 12 inches per minute;
- ~~(c) One (1) wheelabrator shot blaster, constructed in 1990, with a blast rate of 20,000 pounds per hour of steel shot, equipped with a dust collector to control particulate emissions; and~~
- (dc) One (1) blasting operation, originally constructed in 1970 using sand as the abrasive, modified in 1987 to use Black Beauty Grit, with a nozzle internal diameter of 0.5 inches and a nozzle pressure of 100 pounds per square inch, with a throughput of 2,044 pounds per hour, and no control.
- (d) **One (1) Pangborn blast machine, identified as #1 Blast and constructed in 2002, with a maximum abrasive input of 120,000 pounds of black beauty per hour, controlled by a dust collector (#2 BDC), and venting inside the building.**
- (e) **One (1) plasma/oxy-fuel drill machine, identified as #3 OFD and constructed in 2002, with a maximum cutting rate of 600 inches per hour for 2 inches thick steel, controlled by a dust collector (#4 TD), and venting inside the building.**

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

D.2.2 PSD Minor Limit [326 IAC 2-2][40 CFR 52.24]

~~Both PM and PM10 emissions, from the wheelabrator shall not exceed 0.1 ton per year each (0.023 lb/hr).~~

The PM and PM10 emissions from the Pangborn blast machine (#1 Blast) and the plasma/oxy-fuel drill machine (# OFD) shall not exceed the emission limits listed in the table below:

Units	PM Emission Limit (lbs/hr)	PM10 Emission Limit (lbs/hr)
Pangborn Blast Machine	1.5 lbs/hr	1.5 lbs/hr
Plasma/Oxy-fuel Drill Machine	0.1 lbs/hr	0.1 lbs/hr

This is equivalent to 7.0 tons/yr of PM/PM10 emissions. Combined with Condition D.1.1 and the PM/PM10 emissions from other units, the PM/PM10 emissions from the entire source are limited to less than 250 tons per year.

~~This requirement and the requirement in Condition D.1.1 limit particulate emissions (PM and PM10) such that when including the particulate emissions from the other units at the source, the total source emissions remain below two hundred fifty (250) tons per year. Therefore the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.24 are not applicable.~~

D.2.4 Particulate Matter (PM)

In order to comply with Condition D.2.1 and D.2.2, the dust collector for PM control shall be in operation and control emissions from the ~~wheelabrator shot blaster~~ **Pangborn blast machine (#1 Blast) and the plasma/oxy-fuel drill machine (#3 OFD)** at all times that the ~~wheelabrator shot~~

~~blaster~~ **Pangborn blast machine (#1 Blast) and the plasma/oxy-fuel drill machine (#3 OFD) is are** in operation.

D.2.5 Visible Emissions Notations

- (a) Once per shift visible emission notations of the ~~wheelabrator shot-blaster~~ **Pangborn blast machine (#1 Blast) and the plasma/oxy-fuel drill machine (#3 OFD)** stack exhausts shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

D.2.6 Parametric Monitoring

The Permittee shall record the total static pressure drop across the dust collectors used in conjunction with the ~~wheelabrator shot-blaster~~ **Pangborn blast machine (#1 Blast) and the plasma/oxy-fuel drill machine (#3 OFD)**, at least once per shift when the ~~wheelabrator shot-blaster~~ **Pangborn blast machine (#1 Blast) and the plasma/oxy-fuel drill machine (#3 OFD)** is are in operation when venting to the atmosphere. When for any one reading, the pressure drop across the dust collector is outside the normal range of 3.0 and 6.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Compliance Response Plan - Preparation, Implementation, Records, and Reports. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

D.2.7 Baghouse Inspections

An inspection shall be performed each calendar quarter of all bags controlling the ~~wheelabrator~~ **Pangborn blast machine (#1 Blast) and the plasma/oxy-fuel drill machine (#3 OFD)** when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. **Inspections required by this condition shall not be performed in consecutive months.** All defective bags shall be replaced.

D.2.9 Record Keeping Requirements

- (a) To document compliance with Condition D.2.5, the Permittee shall maintain records of once per shift visible emission notations of the ~~wheelabrator shot-blaster~~ **Pangborn blast machine (#1 Blast) and the plasma/oxy-fuel drill machine (#3 OFD)** stack exhausts.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

Part 70 Quarterly Report

Source Name: Munster Steel Co., Inc.
Source Address: 9505 Calumet Ave., Munster, Indiana 46321
Mailing Address: 9505 Calumet Ave., Munster, Indiana 46321
Part 70 Permit No.: T089-4292-00090
Facility: Paint Booth
Parameter: Solids content
Limit: The source shall limit the solids content of the coatings, primers, thinners, and cleaners inputted to the paint booth to less than ~~five hundred ninety-six (596)~~ **two hundred (200)** tons per twelve (12) consecutive month period **with compliance determined at the end of each month.** This is equivalent to limiting the particulate emissions from the paint booth to less than ~~one hundred forty-nine (149)~~ **fifty (50)** tons per year.

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

? No deviation occurred in this quarter.

? Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

Conclusion

The construction of this proposed modification shall be subject to the conditions of the attached proposed Part 70 Minor Source Modification No. 089-18431-00090. The operation of this proposed modification shall be subject to the conditions of the attached proposed Part 70 Significant Permit Modification No. 089-17252-00090.

**Appendix A: Emission Calculations
PM and PM10 Emissions
From the Pangborn Blast Machine (#1 Blast)**

**Company Name: Munster Steel Co., Inc.
Address: 9505 Calumet Ave., Munster, IN 46321
SPM: 089-17252-00090
Reviewer: ERG/YC
Date: June 2, 2003**

Type of Abrasive Used: Black Beauty

Unit ID	Max. Abrasive Usage (lbs/hr)	*PM Emission Factor (lbs/lbs)	Potential PM (lbs/hr)	Potential PM (ton/yr)	*PM10 Emission Factor (lbs/lbs PM)	Potential PM10 (lbs/hr)	Potential PM10 (ton/yr)	Control Device	Control Efficiency	PTE of PM (lbs/hr)	PTE of PM (ton/yr)	PTE of PM10 (lbs/hr)	PTE of PM10 (ton/yr)
#1 Blast	120,000	0.01	1200.0	5256.0	0.70	840.0	3679.2	Dust Collector	99.9%	1.20	5.26	0.84	3.68
Total				5256.0			3679.2				5.26		3.68

* The emission factors are from grit blasting from Air Quality Permits, Vol.1, Section 3 "Abrasive Blasting" (1991 Edition) by Stappa Alapco.

Methodology

PTE = Potential to Emit

Potential PM (lbs/hr) = Max. Abrasive Usage (lbs/hr) x PM Emission Factor (lbs/lbs)

Potential PM (tons/yr) = Max. Abrasive Usage (lbs/hr) x PM Emission Factor (lbs/lbs) x 8760 hr/yr x 1 ton/2000 lbs

Potential PM10 Emissions = Potential PM Emissions x PM10 Emission Factor

Potential to Emit = Potential Emissions x (1 - Control Efficiency)

Appendix A: Emission Calculations

**PM/PM10 and HAP Emissions
From the Peddinghaus Plasma/Oxy-fuel Drill Machine (#3 OFD)**

**Company Name: Munster Steel Co., Inc.
Address: 9505 Calumet Ave., Munster, IN 46321
SPM: 089-17252-00090
Reviewer: ERG/YC
Date: June 2, 2003**

FLAME CUTTING	Number of Stations	Max. Metal Thickness Cut (in.)	Max. Metal Cutting Rate (in./minute)	EMISSION FACTORS* (lb pollutant/1,000 inches cut, 1" thick)**				EMISSIONS (lbs/hr)				Total HAPS (lbs/hr)
				PM=PM10	Mn	Ni	Cr	PM = PM10	Mn	Ni	Cr	
Oxyacetylene	1	2.0	600	0.1622	0.0005	0.0001	0.0003	11.68	0.04	0.01	0.02	0.065
Oxymethane	1	2.0	600	0.0815	0.0002		0.0002	5.87	0.01	0	0.01	0.029
Plasma*	1	2.0	600	0.0039				0.281	0	0	0	0.000

EMISSION TOTALS - Worst Case	PM = PM10	Mn	Ni	Cr	Total HAPS
Potential Emissions (lbs/hr)	11.7	0.04	0.01	0.02	0.06
Potential Emissions (lbs/day)	280.3	0.86	0.17	0.52	1.56
Potential Emissions (tons/year)	51.2	0.16	0.03	0.09	0.28
Potential to Emit (lbs/hr) after Baghouse Control	0.01	3.6E-05	7.2E-06	2.2E-05	6.5E-05
Potential to Emit (tons/year)	0.05	1.6E-04	3.2E-05	9.5E-05	2.8E-04

*Emission Factor for plasma cutting from American Welding Society (AWS). Trials reported for wet cutting of 8 mm thick mild steel with 3.5 m/min cutting speed (at 0.2 g/min emitted). Therefore, the emission factor for plasma cutting is for 8 mm thick mild steel.
Using AWS average values: (0.25 g/min)/(3.6 m/min) x (0.0022 lb/g)/(39.37 in./m) x (1,000 in.) = 0.0039 lb/1,000 in. cut, 8 mm thick.

METHODOLOGY

Cutting emissions (lb/hr) = (# of stations) x (max. metal thickness, in.) x (max. cutting rate, in./min.) x (60 min./hr.) x (emission factor, lb. pollutant/1,000 in. cut, 1" thick)
Plasma cutting emissions (lb/hr) = (# of stations) x (max. cutting rate, in./min.) x (60 min./hr.) x (emission factor, lb. pollutant/1,000 in. cut, 8 mm thick)
Potential Emissions (lbs/hr) = Worst Case scenario within different cutting methods.
Potential Emissions (lbs/day) = emissions (lbs/hr) x 24 hrs/day
Potential Emissions (tons/yr) = emissions (lb/hr) x 8,760 hrs/year x 1 ton/2,000 lbs.
Potential to Emit (lbs/hr) = Potential Emissions (lbs/hr) x (1-99.9%)
Potential to Emit (tons/yr) = Potential Emissions (lbs/hr) x 8760 hr/yr x 1 ton/2000 lbs x (1-99.9%)